

### REMARKS

Examiner Kelly L. Jerabek is thanked for the thorough examination and search of the subject Patent Application.

All Claims are believed to be in condition for Allowance, and that is so requested.

Reconsideration of rejected claims **1 - 8, 10 – 16, and 26** under 35 U.S.C. 103(a) as being unpatentable over Narayanaswami et al (US pub. 2003/0011684) in view of Anderson US 6,532,039 is requested based on following remarks:

Claim **1** of the claimed invention teaches:

1. A method of embedding camera information and image capture related information in a digital form of an image, comprising:
  - receiving information on a first static camera characteristic **suitable to enhance image reproduction;**
  - receiving camera setting information related to a first captured digitized image;
  - generating an encryption key based at least in part on the first static camera characteristic;
  - embedding a watermark in said first captured digitized image, wherein the watermark contains at least a portion of the information on the first static characteristic and at least a portion of the camera setting information related to said first captured digitized image; and
  - encrypting the watermark using the encryption key.

Claim **26** of the claimed invention teaches

26. A method of including camera information and image capture related information in association with a digital form of an image, comprising:
- capturing an image;
  - digitizing the image;
  - receiving information on a first static camera characteristic **suitable to enhance image reproduction**;
  - inserting in a data set associated with the digitized image at least a portion of the information on the first static characteristic; and
  - transmitting the digitized image and the data set to an image processor.

Narayanaswami et al do not disclose “receiving information on a first static camera characteristic suitable to enhance image reproduction” as the claimed invention does in base claims 1 and 26. Narayanaswami et al. do not disclose even receiving any information on a first static camera characteristic.

Furthermore Narayanaswami et al do not disclose “generating an encryption key based at least in part on the first static camera characteristic” as the claimed invention does in base claim 1 and 26. This is obvious because Narayanaswami et al. do not disclose receiving any information on a first static camera characteristic.

Moreover Anderson does not disclose “receiving information on a first static camera characteristic suitable to enhance image reproduction” either as the claimed invention does in base claims 1 and 26.

Anderson teaches (col. 6, lines 49 – 62):

“The image tag field 610 includes information, preferably in the form of tags, regarding the image represented by the image data 604. Media type tags, for instance, indicate all the media types associated with the image, such as whether

the image is a single image or a panorama image, for example. In certain operating modes, the media type tags are used to select the type of icon that is displayed in the LCD 402 along side the thumbnail image 606. Besides media tags, the image tag field 610 may also include other types of tags for storing additional information regarding the image and/or the camera 110 itself. For example, a tag could be used to indicate the settings of the camera 110 at the time the image was captured, or indicate the identity of the camera manufacturer, for instance."

Applicant believes that "the identity of the camera manufacturer" as disclosed by Anderson does not belong to the category of information "suitable to enhance image reproduction" as claimed by the claimed invention.

Claim 8 of the claimed invention teaches:

8. (currently amended) A digital camera system, comprising:
- an imager;
  - a first static camera characteristic associated with the imager in regard of enhancing image reproduction;
  - a first variable camera setting;
  - a watermark generator used to embed in the form of a watermark at least one of said first static camera characteristic and said first variable camera setting information in an image captured by the camera; and
  - a key generator configured to generate an encryption key used to encrypt the watermark.

The same arguments apply for claim 8 as for claim 1 discussed above. Neither Narayanaswami et al. nor Anderson disclose

"a first static camera characteristic associated with the imager in regard of enhancing image reproduction"

as disclosed in claim 8 of the claimed invention.

None of the applied or known references address the claimed invention as shown in claims 1 - 8, 10 – 16 and 26 in which methods (Claims 1 – 7, and 26) and camera systems (Claims 8-16) comprising “receiving information on a first static camera characteristic suitable to enhance image reproduction” or “a first static camera characteristic associated with the imager in regard of enhancing image reproduction are described.

To achieve the systems and methods of the claimed invention, which include camera information and image capture related information in association with a digital form of an image, comprising “receiving information on a first static camera characteristic suitable to enhance image reproduction”, it would be not be obvious to combine the invention of Narayanaswami et al. disclosing “a system and methods for digital image verification” with the invention of Anderson disclosing “an image capturing unit and more particularly a method and system for stamping of images captured with an image capture unit”. The claimed invention is believed to be patentable over the prior art cited, as it is respectfully suggested that the combination of these various references cannot be made without reference to Applicant's own invention. None of the applied references address or suggest a “receiving information on a first static camera characteristic suitable to enhance image reproduction” while this is an important feature of the claimed invention to enhance image reproduction” improving image reproduction. Applicant has claimed his circuits and methods in detail.

Claims **2-7** are dependent claims upon base claim **1** which is believed to be patentable according the arguments above.

Claims **10-16** are dependent claims upon base claim **8** which is believed to be patentable according the arguments above.

Reconsideration of rejected claim **9** under 35 U.S.C. 103(a) as being unpatentable over Narayanaswami et al (US pub. 2003/0011684) in view of Anderson US 6,532,039 and further in view of Isnardi et al. US 6,037,984 is requested based on following remarks:

Claim **9** is a dependent claim upon base claim **8** which is believed to be patentable according the arguments above.

The systems and methods of Claims 1-16 and 26 are believed to be novel and patentable over these various references as outlined above because there is not sufficient basis for concluding that the combination of claimed elements would have been obvious to one skilled in the art. That is to say, there must be something in the prior art or line of reasoning to suggest that the combination of these various references is desirable. We believe that there is no such basis for the combination. We therefore request Examiner Kelly L. Jerabek to reconsider the rejection in view of these arguments.

Applicants have reviewed the prior art made of record and not relied upon and have discussed their impact on the present invention above.

Allowance of all Claims is requested.

It is requested that should the Examiner not find that the Claims are now allowable that the Examiner call the undersigned at 845-452-5863 to overcome any problems preventing allowance.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'SBA', written over a horizontal line.

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